DOVER COLLEGE

25 April 2019

Lisa Atkinson

Principal Policy Advisor

ICO

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Dear Lisa,

I thought you would like some feedback on the draft age-appropriate design code. Please find this enclosed.

The email addresses could not link, by the way. My very best wishes,

[redacted]

Keith Cox

PSHE Coordinator, Senior School – Dover College

Keith Cox

To: ageappropriatedesigncode@ico.org.uk

[redacted]

Subject: ICO design code - feedback on draft code from pupils at Dover College, Kent

[redacted]

We were very pleased to receive your email thanking us for our input with the draft age appropriate code. We have followed this up with some of our older pupils and thought you would appreciate their feedback on specific points as follows:

Generally, the pupils felt that the code was clear and unambiguous. There were some points that they felt needed elaboration as follows:

Point 7: What information is really needed? Could ICO state - specifically – what information should or should not be gathered and the amount.

Point 10: Can the company be left to judge what is good for children? An advertising firm could see this point as a "get out clause" to get as much information as they want.

Point 12: Like point 7, getting information that the firm "really need" is too loose. Can there be clear rules on what information NOT to collect ?

Point 14: Pupils felt that the firm being left to police their own content was not enough. Each site should have a link to an independent complaints organisation such as ICO or CEOP.

Points 15 & 16: Companies should have clearly written policies and be accountable for making sure that each employee is aware of these policies.

Best wishes,

Keith Cox BA (Hons)
Head of, Leadership & Service, DofE,LRC,and PSHE, Dover College
[redacted]
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